

From: [Ogulei, David](#)
To: [Schnepp, Jason](#)
Cc: [Romaine, Chris](#)
Subject: RE: application
Date: Wednesday, June 05, 2013 3:53:00 PM

Hi Jason,

Here are some follow-up questions:

1. Do you also have the 9/29-10/1/09 test results? I would like to compare the 2009 test data to the 2011 data since St. Gobain appears to be using both data sets.
2. It seems that St. Gobain developed a single emission factor for PM_{2.5} and other pollutants based on test results from the two tests conducted in 2009 and 2011. But, it's not clear whether this is consistent with their AER reports during the baseline period, and/or if they are indeed reporting "actual" emissions over the baseline period. The baseline period was January 2010 through December 2011 so the 2011 test (conducted 7/28-29/11) falls within this period. Presumably, St. Gobain would have used test data from the 2009 test to report pre-July 2011 actual emissions. Note that St. Gobain is prohibited under 52.21(b)(48)(i)(d) from using any consecutive 24-month period for which there is inadequate information for determining annual emissions and for adjusting this amount for non-compliant emissions if required.
3. Also, for PM/PM₁₀/PM_{2.5}, St. Gobain assumed that condensable PM (CPM) was "18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's fleet..." It is not clear why St. Gobain did not use the results of the 2011 or 2009 testing at the Dolton facility, as appropriate, to derive the CPM emission rates. The 2011 test results suggest that the CPM fraction was lower than 18.7% (more like 15% on average).
4. St. Gobain also assumed that all of the condensable PM is PM₁₀ and PM_{2.5} and that 95% of filterable PM is filterable PM₁₀ and 91% of filterable PM is filterable PM_{2.5}, "consistent with AP-42 Table 11.15-3." Although still widely used, the AP-42 particle size distributions are now more than 25 years old and are rated "E". It is not clear whether St. Gobain has more recent (post 1980s) PM_{2.5} and PM₁₀ test data from similar units. It's also not clear whether the "2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's fleet...", as cited by St. Gobain, also included filterable PM_{2.5} and/or PM₁₀ emission rates.

Thanks,

David

From: Schnepp, Jason [mailto:Jason.Schnepp@Illinois.gov]
Sent: Wednesday, June 05, 2013 11:08 AM
To: Ogulei, David
Cc: Romaine, Chris
Subject: application

David,

Here are the pages I think you may be interested in. If you need more, let me know.

Thanks.

Jason